## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SEYED MOHSEN HOSSEINI-SEDEHY,	)
Plaintiff,	)
v.	)
ERIN T. WITHINGTON and CITY OF BOSTON,	) Civil Action No. 04-cv-11948-RGS
Defendants.	)

## ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO THE SUFFOLK DISTRICT ATTORNEY'S OFFICE MOTION TO QUASH THE SUBPOENA

Now comes Seyed Mohsen Hosseini-Sedehy ("Mr. Hosseini"), with the assent of counsel for the Suffolk District Attorney, and respectfully requests this Court to permit him an additional one week to respond to the Suffolk District Attorney's Office Motion to Quash the Subpoena (the "motion") filed on Friday, June 3, 2005. As reasons therefore, the Mr. Hosseini asserts that his counsel who has been working with counsel for the Suffolk District Attorney, has been ill since Monday evening and has been out of work since this morning. An additional one week time will permit Mr. Hosseini an adequate opportunity to prepare an opposition to the motion.

Wherefore, Mr. Hosseini asks that his request for additional time to file an opposition to the motion be allowed.

Local Rule 7.1(A)(2) Certification

The undersigned certifies that Christopher A. Duggan has conferred in good faith with counsel for Suffolk District Attorney's Office pursuant to Local Rule 7.1(A)(2) and was able to agree on this issue.

Respectfully submitted, Seyed Mohsen Hosseini-Sedehy By his attorneys,

/s/ Gerard A. Butler, Jr. Christopher A. Duggan BBO # 544150 Gerard A. Butler, Jr. BBO # 557176 Smith & Duggan LLP Lincoln North 55 Old Bedford Road Lincoln, MA 01773-1125 (617) 228-4400

Date: June 17, 2005

## **CERTIFICATE OF SERVICE**

I, Gerard A. Butler, Jr., hereby certify that I have caused a copy of the ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO THE SUFFOLK DISTRICT ATTORNEY'S OFFICE MOTION TO QUASH THE SUBPOENA to be served via fist-class mail, postage prepaid, to counsel of record as listed below.

Amy E. Ambarik City of Boston Law Department Boston City Hall, Room 615 1 City Hall Plaza Boston, MA 02201

Eva M. Badway Assistant Attorney General Office of the Attorney General Criminal Bureau One Ashburton Place Boston, MA. 02108

/s/ Gerard A. Butler, Jr. Gerard A. Butler, Jr. BBO No. 557176

Date: June 17, 2005